REMARKS

Applicant respectfully requests entry of the following amendments and remarks in response to the Office Action mailed March 27, 2008. Applicant respectfully submits that the amendments and remarks contained herein place the instant application in condition for allowance.

Upon entry of the amendments in this response, claims 1 – 18 and 24 are pending. In particular, Applicant amends claims 1, 3 – 5, 10, 15, 17 – 18, and 24. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

I. Rejections Under 35 U.S.C. §103 – *Brown* in view of *Barlow* further in view of *Goodman*

A. Claim 1 is Allowable Over *Brown* further in view of *Barlow* further in view of *Goodman*

The Office Action indicates that claim 1 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Number 6,278,448 ("*Brown*") further in view of U.S. Patent Number 6,275,933 ("*Barlow*") further in view of Dynamic HTML: The Definitive Reference, 1998, Chapter 4 ("*Goodman*"). Applicant respectfully traverses this rejection for at least the reason that *Brown* further in view of *Barlow* further in view of *Goodman* fails to disclose, teach, or suggest all of the elements of claim 1. More specifically, claim 1 recites:

> A method for preventing data entry via a data input screen on a client device, comprising:
> rendering source code that defines said data input screen in said client device;
> defining an executable script within said source code; and
> executing said executable script in response to user input,
> wherein said executable script operates within said client device to render said data input screen inaccessible to prevent subsequent user input;
> wherein executing further comprises:
> associating said executable script with a predetermined z-index number for a web page; and
> ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***.

(Emphasis added).

Applicant respectfully submits that claim 1 is allowable over the cited art for at least the reason that the Office Action fails to establish a publication date for *Goodman* that precedes the filing date of the present application. More specifically, the Office Action relies on the copyright notice attached to *Goodman* to establish a publication date of 1998 (see *Goodman*, second to last page). However, Applicant respectfully submits that this date cannot be accurate. More specifically, in multiple places (*e.g.,* section 4.2.1, page 2 of 9 and section 4.5.2, page 6 of 7), *Goodman* refers to Internet Explorer 6.0. However, as illustrated in Exhibit A, Internet Explorer 6.0 was not released until August 27, 2001. Consequently, such reference to Internet Explorer 6.0 could not have been made thee (3) years prior to the release of Internet Explorer 6.0. In fact, as further illustrated in Exhibit A, Internet Explorer 5.0 was not finally released until 1999, which is a year after the alleged publication date of *Goodman*. Similarly, *Goodman* also refers to Netscape 6 (*e.g.,* section 4.2.1, page 2 of 9). However, as illustrated in Exhibit B, the first release of Netscape 6 was not until November 14, 2000, two (2) years after the alleged publication date of *Goodman*. Consequently, *Goodman* could not have been published in 1998, as suggested by the Office Action.

Additionally, even if *Goodman* is a valid reference (a point Applicant is not conceding), *Goodman* fails to disclose or suggest a "method for preventing data entry via a data input screen on a client device, comprising… ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 1. More specifically, *Goodman* discloses "z-index values are adjusted by scripts when a user interacts with maneuverable content… or when a script moves an element as a form of animation" (section 4.2.6, page 7 of 9, fourth paragraph). However, *Goodman* fails to even suggest "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 1.

Further, *Brown* fails to overcome the deficiencies of *Goodman*. More specifically, the Office Action admits that "Brown further fails to disclose associating the executable script with a predetermined z-index number for a web page and rendering inaccessible those data entry elements associated with the web page that have a z-index number lower than the predetermined z-index number" (page 3, line 8).

Additionally, *Barlow* fails to overcome the deficiencies of *Goodman* and *Brown*. More specifically, *Barlow* discloses "when the end user changes the state of the object 18 from the default state 30 by placing the cursor over the object 18 (step 834), then the object 18 traverses the list of subcomponents 820' in the default object state list 804 and deactivates each of these subcomponents 820" (column 8, line 32). As illustrated in this passage, *Barlow* appears to disclose that a subcomponent can be disabled based placing a cursor over an object. Applicant respectfully submits that this is different than "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 1. For at least these reasons, claim 1 is allowable.

B. Claim 5 is Allowable Over *Brown* further in view of *Barlow* further in view of *Goodman*

The Office Action indicates that claim 5 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Number 6,278,448 ("*Brown*") further in view of U.S. Patent Number 6,275,933 ("*Barlow*") further in view of Dynamic HTML: The Definitive Reference, 1998, Chapter 4 ("*Goodman*"). Applicant respectfully traverses this rejection for at least the reason that *Brown* further in view of *Barlow* further in view of *Goodman* fails to disclose, teach, or suggest all of the elements of claim 5. More specifically, claim 5 recites:

> A method for preventing data entry via a data input screen on a client device, comprising:
> rendering source code that defines said data input screen in said client device;

defining an executable script within said source code; and
executing said executable script in response to user input,
wherein said executable script operates within said client device to render said data input screen inaccessible to prevent subsequent user input;
wherein executing further comprises:
associating said executable script with a predetermined z-index number for a web page; and
rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number.

(Emphasis added).

Applicant respectfully submits that claim 5 is allowable over the cited art for at least the reason that the Office Action fails to establish a publication date for *Goodman* that precedes the filing date of the present application. More specifically, the Office Action relies on the copyright notice attached to *Goodman* to establish a publication date of 1998 (see *Goodman*, second to last page). However, Applicant respectfully submits that this date cannot be accurate. More specifically, in multiple places (*e.g.,* section 4.2.1, page 2 of 9 and section 4.5.2, page 6 of 7), *Goodman* refers to Internet Explorer 6.0. However, as illustrated in Exhibit A, Internet Explorer 6.0 was not released until August 27, 2001. Consequently, such reference to Internet Explorer 6.0 could not have been made thee (3) years prior to the release of Internet Explorer 6.0. In fact, as further illustrated in Exhibit A, Internet Explorer 5.0 was not finally released until 1999, which is a year after the alleged publication date of *Goodman*. Similarly, *Goodman* also refers to Netscape 6 (*e.g.,* section 4.2.1, page 2 of 9). However, as illustrated in Exhibit B, the first release of Netscape 6 was not until November 14, 2000, two (2) years after the alleged publication date of *Goodman*. Consequently, *Goodman* could not have been published in 1998, as suggested by the Office Action.

Additionally, even if *Goodman* is a valid reference (a point Applicant is not conceding), *Goodman* fails to disclose or suggest a "method for preventing data entry via a data input screen on a client device, comprising… ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined***

z-index number" as recited in claim 5. More specifically, *Goodman* discloses "z-index values are adjusted by scripts when a user interacts with maneuverable content… or when a script moves an element as a form of animation" (section 4.2.6, page 7 of 9, fourth paragraph). However, *Goodman* fails to even suggest "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 5.

Further, *Brown* fails to overcome the deficiencies of *Goodman*. More specifically, the Office Action admits that "Brown further fails to disclose associating the executable script with a predetermined z-index number for a web page and rendering inaccessible those data entry elements associated with the web page that have a z-index number lower than the predetermined z-index number" (page 3, line 8).

Additionally, *Barlow* fails to overcome the deficiencies of *Goodman* and *Brown*. More specifically, *Barlow* discloses "when the end user changes the state of the object 18 from the default state 30 by placing the cursor over the object 18 (step 834), then the object 18 traverses the list of subcomponents 820' in the default object state list 804 and deactivates each of these subcomponents 820" (column 8, line 32). As illustrated in this passage, *Barlow* appears to disclose that a subcomponent can be disabled based placing a cursor over an object. Applicant respectfully submits that this is different than "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 5. For at least these reasons, claim 5 is allowable.

C. Claim 10 is Allowable Over *Brown* further in view of *Barlow* further in view of *Goodman*

The Office Action indicates that claim 10 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Number 6,278,448 ("*Brown*") further in view of U.S. Patent Number 6,275,933 ("*Barlow*") further in view of Dynamic HTML: The Definitive Reference, 1998, Chapter 4 ("*Goodman*"). Applicant respectfully traverses this rejection for at least the reason that *Brown* further in view of *Barlow* further in view of *Goodman* fails to disclose, teach, or suggest all of the elements of claim 10. More specifically, claim 10 recites:

> A computer-readable medium having computer-executable components comprising:
>
> a form definition component defining a data input screen and a data submission field;
>
> a style definition component defining a layer having a width and height at least as large as said data submission field;
>
> a function definition component responsive to said data submission field, wherein upon execution of said function definition component, said layer operates to render said data submission field inaccessible on said form;
>
> wherein said computer-executable components are operable to perform the following:
>
> associating said executable script with a predetermined z-index number for a web page, and
>
> ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***.

(Emphasis added).

Applicant respectfully submits that claim 10 is allowable over the cited art for at least the reason that the Office Action fails to establish a publication date for *Goodman* that precedes the filing date of the present application. More specifically, the Office Action relies on the copyright notice attached to *Goodman* to establish a publication date of 1998 (see *Goodman*, second to last page). However, Applicant respectfully submits that this date cannot be accurate. More specifically, in multiple places (*e.g.,* section 4.2.1, page 2 of 9 and section 4.5.2, page 6 of 7), *Goodman* refers to Internet Explorer 6.0. However, as illustrated in Exhibit A, Internet Explorer 6.0 was not released until August 27, 2001. Consequently, such reference to Internet Explorer 6.0 could not have been made thee (3) years prior to the release of Internet Explorer 6.0. In

fact, as further illustrated in Exhibit A, Internet Explorer 5.0 was not finally released until 1999, which is a year after the alleged publication date of *Goodman*. Similarly, *Goodman* also refers to Netscape 6 (*e.g.,* section 4.2.1, page 2 of 9). However, as illustrated in Exhibit B, the first release of Netscape 6 was not until November 14, 2000, two (2) years after the alleged publication date of *Goodman*. Consequently, *Goodman* could not have been published in 1998, as suggested by the Office Action.

Additionally, even if *Goodman* is a valid reference (a point Applicant is not conceding), *Goodman* fails to disclose or suggest a "computer-readable medium having computer-executable components… wherein said computer-executable components are operable to perform the following… ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 10. More specifically, *Goodman* discloses "z-index values are adjusted by scripts when a user interacts with maneuverable content… or when a script moves an element as a form of animation" (section 4.2.6, page 7 of 9, fourth paragraph). However, *Goodman* fails to even suggest "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 10.

Further, *Brown* fails to overcome the deficiencies of *Goodman*. More specifically, the Office Action admits that "Brown further fails to disclose associating the executable script with a predetermined z-index number for a web page and rendering inaccessible those data entry elements associated with the web page that have a z-index number lower than the predetermined z-index number" (page 3, line 8).

Additionally, *Barlow* fails to overcome the deficiencies of *Goodman* and *Brown*. More specifically, *Barlow* discloses "when the end user changes the state of the object 18 from the default state 30 by placing the cursor over the object 18 (step 834), then the object 18 traverses the list of subcomponents 820' in the default object state list 804 and deactivates each of these

subcomponents 820" (column 8, line 32). As illustrated in this passage, *Barlow* appears to disclose that a subcomponent can be disabled based placing a cursor over an object. Applicant respectfully submits that this is different than "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 10. For at least these reasons, claim 10 is allowable.

D. Claim 15 is Allowable Over *Brown* further in view of *Barlow* further in view of *Goodman*

The Office Action indicates that claim 15 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Number 6,278,448 ("*Brown*") further in view of U.S. Patent Number 6,275,933 ("*Barlow*") further in view of Dynamic HTML: The Definitive Reference, 1998, Chapter 4 ("*Goodman*"). Applicant respectfully traverses this rejection for at least the reason that *Brown* further in view of *Barlow* further in view of *Goodman* fails to disclose, teach, or suggest all of the elements of claim 15. More specifically, claim 15 recites:

> A method for preventing data entry to a server computer from a client computer, comprising:
> receiving a request for an exchange of data from said client computer;
> defining an executable script within a source code, said executable script operating in response to a client computer input and rendering a data input screen inaccessible to prevent subsequent input from said client computer; and
> providing said source code that defines said data input screen;
> wherein defining further comprises:
> associating said executable script with a predetermined z-index number for a web page; and
> ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***.
> ***(Emphasis added).***

Applicant respectfully submits that claim 15 is allowable over the cited art for at least the reason that the Office Action fails to establish a publication date for *Goodman* that precedes the

filing date of the present application. More specifically, the Office Action relies on the copyright notice attached to *Goodman* to establish a publication date of 1998 (see *Goodman*, second to last page). However, Applicant respectfully submits that this date cannot be accurate. More specifically, in multiple places (*e.g.,* section 4.2.1, page 2 of 9 and section 4.5.2, page 6 of 7), *Goodman* refers to Internet Explorer 6.0. However, as illustrated in Exhibit A, Internet Explorer 6.0 was not released until August 27, 2001. Consequently, such reference to Internet Explorer 6.0 could not have been made thee (3) years prior to the release of Internet Explorer 6.0. In fact, as further illustrated in Exhibit A, Internet Explorer 5.0 was not finally released until 1999, which is a year after the alleged publication date of *Goodman*. Similarly, *Goodman* also refers to Netscape 6 (*e.g.,* section 4.2.1, page 2 of 9). However, as illustrated in Exhibit B, the first release of Netscape 6 was not until November 14, 2000, two (2) years after the alleged publication date of *Goodman*. Consequently, *Goodman* could not have been published in 1998, as suggested by the Office Action.

Additionally, even if *Goodman* is a valid reference (a point Applicant is not conceding), *Goodman* fails to disclose or suggest a "method for preventing data entry to a server computer from a client computer, comprising… ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 15. More specifically, *Goodman* discloses "z-index values are adjusted by scripts when a user interacts with maneuverable content… or when a script moves an element as a form of animation" (section 4.2.6, page 7 of 9, fourth paragraph). However, *Goodman* fails to even suggest "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 15.

Further, *Brown* fails to overcome the deficiencies of *Goodman*. More specifically, the Office Action admits that "Brown further fails to disclose associating the executable script with a predetermined z-index number for a web page and rendering inaccessible those data entry

elements associated with the web page that have a z-index number lower than the predetermined z-index number" (page 3, line 8).

Additionally, *Barlow* fails to overcome the deficiencies of *Goodman* and *Brown*. More specifically, *Barlow* discloses "when the end user changes the state of the object 18 from the default state 30 by placing the cursor over the object 18 (step 834), then the object 18 traverses the list of subcomponents 820' in the default object state list 804 and deactivates each of these subcomponents 820" (column 8, line 32). As illustrated in this passage, *Barlow* appears to disclose that a subcomponent can be disabled based placing a cursor over an object. Applicant respectfully submits that this is different than "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 15. For at least these reasons, claim 15 is allowable.

E. Claim 18 is Allowable Over *Brown* further in view of *Barlow* further in view of *Goodman*

The Office Action indicates that claim 18 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Number 6,278,448 ("*Brown*") further in view of U.S. Patent Number 6,275,933 ("*Barlow*") further in view of Dynamic HTML: The Definitive Reference, 1998, Chapter 4 ("*Goodman*"). Applicant respectfully traverses this rejection for at least the reason that *Brown* further in view of *Barlow* further in view of *Goodman* fails to disclose, teach, or suggest all of the elements of claim 18. More specifically, claim 18 recites:

> A method for preventing data entry to a web page comprising:
> associating an executable script with said web page;
> permitting a first data input to said web page;
> executing, in response to said first data input, said executable script; and
> preventing data entry to at least a portion of said web page after execution of said script, wherein preventing further comprises:

> associating said executable script with a predetermined z-index number for said web page; and
>
> ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***.
>
> ***(Emphasis added).***

Applicant respectfully submits that claim 18 is allowable over the cited art for at least the reason that the Office Action fails to establish a publication date for *Goodman* that precedes the filing date of the present application. More specifically, the Office Action relies on the copyright notice attached to *Goodman* to establish a publication date of 1998 (see *Goodman*, second to last page). However, Applicant respectfully submits that this date cannot be accurate. More specifically, in multiple places (*e.g.,* section 4.2.1, page 2 of 9 and section 4.5.2, page 6 of 7), *Goodman* refers to Internet Explorer 6.0. However, as illustrated in Exhibit A, Internet Explorer 6.0 was not released until August 27, 2001. Consequently, such reference to Internet Explorer 6.0 could not have been made thee (3) years prior to the release of Internet Explorer 6.0. In fact, as further illustrated in Exhibit A, Internet Explorer 5.0 was not finally released until 1999, which is a year after the alleged publication date of *Goodman*. Similarly, *Goodman* also refers to Netscape 6 (*e.g.,* section 4.2.1, page 2 of 9). However, as illustrated in Exhibit B, the first release of Netscape 6 was not until November 14, 2000, two (2) years after the alleged publication date of *Goodman*. Consequently, *Goodman* could not have been published in 1998, as suggested by the Office Action.

Additionally, even if *Goodman* is a valid reference (a point Applicant is not conceding), *Goodman* fails to disclose or suggest a "method for preventing data entry to a server computer from a client computer, comprising… ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 18. More specifically, *Goodman* discloses "z-index values are adjusted by scripts when a user interacts with maneuverable content… or when a script moves an element as a form of animation" (section 4.2.6, page 7 of 9, fourth paragraph).

However, *Goodman* fails to even suggest "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 18.

Further, *Brown* fails to overcome the deficiencies of *Goodman*. More specifically, the Office Action admits that "Brown further fails to disclose associating the executable script with a predetermined z-index number for a web page and rendering inaccessible those data entry elements associated with the web page that have a z-index number lower than the predetermined z-index number" (page 3, line 8).

Additionally, *Barlow* fails to overcome the deficiencies of *Goodman* and *Brown*. More specifically, *Barlow* discloses "when the end user changes the state of the object 18 from the default state 30 by placing the cursor over the object 18 (step 834), then the object 18 traverses the list of subcomponents 820' in the default object state list 804 and deactivates each of these subcomponents 820" (column 8, line 32). As illustrated in this passage, *Barlow* appears to disclose that a subcomponent can be disabled based placing a cursor over an object. Applicant respectfully submits that this is different than "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 18. For at least these reasons, claim 18 is allowable.

F. Claim 24 is Allowable Over *Brown* further in view of *Barlow* further in view of *Goodman*

The Office Action indicates that claim 24 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Number 6,278,448 ("*Brown*") further in view of U.S. Patent Number 6,275,933 ("*Barlow*") further in view of Dynamic HTML: The Definitive Reference, 1998, Chapter 4 ("*Goodman*"). Applicant respectfully traverses this rejection for at

least the reason that *Brown* further in view of *Barlow* further in view of *Goodman* fails to disclose, teach, or suggest all of the elements of claim 24. More specifically, claim 24 recites:

> A method for preventing data entry to a web page comprising:
> associating an executable script with said web page;
> determining if said web page used z-index numbers;
> permitting a first data input to said web page;
> executing, in response to said first data input, said executable script; and
> preventing data entry to at least a portion of said web page after execution of said script, wherein preventing further comprises:
> associating said executable script with a predetermined z-index number for said web page if said web page supports using said z-index number;
> associating said executable script with a division of said web page if said web page does not support using said z-index number;
> rendering inaccessible those data entry elements associated with said web page by rendering said division of said web page visible over said data entry elements if said web page does not support using said z-index number; and
> ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number if said web page supports using said z-index number***.
> ***(Emphasis added).***

Applicant respectfully submits that claim 24 is allowable over the cited art for at least the reason that the Office Action fails to establish a publication date for *Goodman* that precedes the filing date of the present application. More specifically, the Office Action relies on the copyright notice attached to *Goodman* to establish a publication date of 1998 (see *Goodman*, second to last page). However, Applicant respectfully submits that this date cannot be accurate. More specifically, in multiple places (*e.g.,* section 4.2.1, page 2 of 9 and section 4.5.2, page 6 of 7), *Goodman* refers to Internet Explorer 6.0. However, as illustrated in Exhibit A, Internet Explorer 6.0 was not released until August 27, 2001. Consequently, such reference to Internet Explorer 6.0 could not have been made thee (3) years prior to the release of Internet Explorer 6.0. In fact, as further illustrated in Exhibit A, Internet Explorer 5.0 was not finally released until 1999, which is a year after the alleged publication date of *Goodman*. Similarly, *Goodman* also refers

to Netscape 6 (*e.g.,* section 4.2.1, page 2 of 9). However, as illustrated in Exhibit B, the first release of Netscape 6 was not until November 14, 2000, two (2) years after the alleged publication date of *Goodman*. Consequently, *Goodman* could not have been published in 1998, as suggested by the Office Action.

Additionally, even if *Goodman* is a valid reference (a point Applicant is not conceding), *Goodman* fails to disclose or suggest a "method for preventing data entry to a web page comprising… ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number if said web page supports using said z-index number***" as recited in claim 24. More specifically, *Goodman* discloses "z-index values are adjusted by scripts when a user interacts with maneuverable content… or when a script moves an element as a form of animation" (section 4.2.6, page 7 of 9, fourth paragraph). However, *Goodman* fails to even suggest "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number if said web page supports using said z-index number***" as recited in claim 24.

Further, *Brown* fails to overcome the deficiencies of *Goodman*. More specifically, the Office Action admits that "Brown further fails to disclose associating the executable script with a predetermined z-index number for a web page and rendering inaccessible those data entry elements associated with the web page that have a z-index number lower than the predetermined z-index number" (page 3, line 8).

Additionally, *Barlow* fails to overcome the deficiencies of *Goodman* and *Brown*. More specifically, *Barlow* discloses "when the end user changes the state of the object 18 from the default state 30 by placing the cursor over the object 18 (step 834), then the object 18 traverses the list of subcomponents 820' in the default object state list 804 and deactivates each of these subcomponents 820" (column 8, line 32). As illustrated in this passage, *Barlow* appears to disclose that a subcomponent can be disabled based placing a cursor over an object. Applicant

respectfully submits that this is different than "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number if said web page supports using said z-index number***" as recited in claim 24. For at least these reasons, claim 24 is allowable.

G. Claims 2 – 4, 6 – 9, 11 – 14, and 16 – 17 are Allowable Over *Brown* further in view of *Barlow* further in view of *Goodman*

The Office Action indicates that claims 2 – 4, 6 – 9, 11 – 14, and 16 – 17 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Number 6,278,448 ("*Brown*") further in view of U.S. Patent Number 6,275,933 ("*Barlow*") further in view of Dynamic HTML: The Definitive Reference, 1998, Chapter 4 ("*Goodman*"). Applicant respectfully traverses this rejection for at least the reason that *Brown* further in view of *Barlow* further in view of *Goodman* fails to disclose, teach, or suggest all of the elements of claims 2 – 4, 6 – 9, 11 – 14, and 16 – 17. More specifically, dependent claims 2 – 4 are believed to be allowable for at least the reason that these claims depend from and include the elements of allowable independent claim 1. Dependent claims 6 – 9 are believed to be allowable for at least the reason that they depend from and include the elements of allowable independent claim 5. Dependent claims 11 – 14 are believed to be allowable for at least the reason that they depend from and include the elements of allowable independent claim 10. Further, dependent claims 16 – 17 are believed to be allowable for at least the reason that they depend from and include the elements of allowable independent claim 15. *In re Fine*, *Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

II. Rejections Under 35 U.S.C. §103 – Claim 18 is Allowable Over *Moneymaker* further in view of *Goodman*

The Office Action indicates that claim 18 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent Publication Number 2002/0049708

("*Moneymaker*") further in view of Dynamic HTML: The Definitive Reference, 1998, Chapter 4 ("*Goodman*"). Applicant respectfully traverses this rejection for at least the reason that *Moneymaker* further in view of *Goodman* fails to disclose, teach, or suggest all of the elements of claim 18. More specifically, claim 18 recites:

> A method for preventing data entry to a web page comprising:
> associating an executable script with said web page;
> permitting a first data input to said web page;
> executing, in response to said first data input, said executable script; and
> preventing data entry to at least a portion of said web page after execution of said script, wherein preventing further comprises:
> associating said executable script with a predetermined z-index number for said web page; and
> ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***.
> ***(Emphasis added).***

Applicant respectfully submits that claim 18 is allowable over the cited art for at least the reason that the Office Action fails to establish a publication date for *Goodman* that precedes the filing date of the present application. More specifically, the Office Action relies on the copyright notice attached to *Goodman* to establish a publication date of 1998 (see *Goodman*, second to last page). However, Applicant respectfully submits that this date cannot be accurate. More specifically, in multiple places (*e.g.,* section 4.2.1, page 2 of 9 and section 4.5.2, page 6 of 7), *Goodman* refers to Internet Explorer 6.0. However, as illustrated in Exhibit A, Internet Explorer 6.0 was not released until August 27, 2001. Consequently, such reference to Internet Explorer 6.0 could not have been made thee (3) years prior to the release of Internet Explorer 6.0. In fact, as further illustrated in Exhibit A, Internet Explorer 5.0 was not finally released until 1999, which is a year after the alleged publication date of *Goodman*. Similarly, *Goodman* also refers to Netscape 6 (*e.g.,* section 4.2.1, page 2 of 9). However, as illustrated in Exhibit B, the first release of Netscape 6 was not until November 14, 2000, two (2) years after the alleged

publication date of *Goodman*. Consequently, *Goodman* could not have been published in 1998, as suggested by the Office Action.

Additionally, even if *Goodman* is a valid reference (a point Applicant is not conceding), *Goodman* fails to disclose or suggest a "method for preventing data entry to a web page comprising… ***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 18. More specifically, *Goodman* discloses "z-index values are adjusted by scripts when a user interacts with maneuverable content… or when a script moves an element as a form of animation" (section 4.2.6, page 7 of 9, fourth paragraph). However, *Goodman* fails to even suggest "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 18.

Further, *Moneymaker* fails to overcome the deficiencies of *Goodman*. More specifically, *Moneymaker* discloses "providing a static interface environment which allows items and/or information to be presented to a client/user via a single emanation of a graphical interface environment, such as a 'window' or 'web page'" (page 1, paragraph [0008]). However, *Moneymaker* fails to even suggest "***rendering inaccessible those data entry elements associated with said web page that have a z-index number lower than said predetermined z-index number***" as recited in claim 18. For at least these reasons, claim 18 is allowable.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicant respectfully submits that all objections and/or rejections have been traversed, rendered moot, and/or addressed, and that the now pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested.

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and Official Notice, or statements interpreted similarly, should not be considered well-known for the particular and specific reasons that the claimed combinations are too complex to support such conclusions and because the Office Action does not include specific findings predicated on sound technical and scientific reasoning to support such conclusions.

If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

/afb/
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